

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: SHANNI SUE SNYDER, Debtor.	Bankruptcy No. 18-21983-CMB Chapter 7
CHARLES O. ZEBELY, JR., Trustee/Movant, v. SHANNI SUE SNYDER Debtor/Respondent.	

**AGREED ORDER REGARDING THE TRUSTEE'S MOTION TO APPROVE
SETTLEMENT OF THE EXEMPTION OF DEBTOR'S ASSETS**

~~AND NOW, upon consideration of the Motion of Trustee Charles O. Zebley, Jr. to approve settlement, the Court orders, adjudges, and decrees as follows:~~

AND NOW COMES Christine Biros ("Biros") and Charles O. Zebley, Jr., Chapter 7 Trustee ("Trustee"), and collectively (the "Parties"), by and through their respective undersigned counsel and file this Agreed Order Regarding the Trustee's Motion to Approve Settlement of the Exemption of Debtor's Assets (the ("Settlement Motion"), averring as follows:

1. As of February 7, 2023, the Parties have reached an agreement related to the Settlement Motion. Biros agrees to withdraw her objection to the Settlement Motion in reliance on the agreement of the Parties as set forth herein and pursuant to the Settlement and Certification of Counsel Regarding Biros' Expedited Motion for Relief from the Automatic Stay.
2. AND NOW, upon consideration of the following, the Court orders, adjudges and decrees as follows:

a. *Biros' objection to the Settlement Motion is hereby WITHDRAWN.*

b. *The Settlement Motion has no preclusive effect on any other issue or proceeding;*

and

a.c. *Biros reserves all her rights in full which includes, without limitation, the right to*

challenge any of the Debtor's claim(s) as well as the Federal Court Judgment,

entered at Case No. 2:21-cv-994 in the United States District Court Western

District of Pennsylvania, Snyder v. U Lock, Inc.

- ~~1. The Shanni Sue Snyder bankruptcy estate will receive the first \$32,500 payable to Debtor Shanni Sue Snyder as part of any distribution in the U Lock, Inc. bankruptcy at case number 22-20823-GLT.~~
- ~~2. Debtor has standing to pursue all claims and objections she has against U Lock, and any claims and objections she acquires from the U Lock estate, Trustee Slone and/or U Lock, including all rights, claims, demands, actions causes of actions, and/or claims for relief including those under Chapter 5 of the Bankruptcy Code and nonbankruptcy law claims that may be asserted by the Trustee, the U Lock estate, or U Lock Inc., with the exception of cash held by the Trustee and the estate's possible claim against George Snyder for actions under 546 and 547 of the Bankruptcy. Trustee Zebley will not interfere in the pursuit of any of these claims. Debtor will cooperate fully to enable Trustee Zebley to collect the first \$32,500 distributed to Debtor in the U Lock bankruptcy.~~
- ~~3. Debtor will not exempt any of the \$32,500.~~
- ~~4. Trustee Zebley will pay any surplus to Debtor.~~
- ~~5. Trustee Zebley abandons all of the Debtor's remaining assets, including the Judgment and any amount of the U.S. District Court Judgment entered at 2:21-cv-994 in the United States District Court Western District of Pennsylvania, Snyder v. U Lock, Inc. except for the first \$32,500 payable to Debtor in the U Lock bankruptcy.~~
- ~~6. Trustee Zebley, the Debtor and all parties in interest reserve their right to object to all or any portion of the Claim No. 1 files by John Biros in the amount of \$5,158.00 in the Snyder Bankruptcy Case. Debtor Further agrees she will not object to Claim No. 2 Greensburg Central Catholic Junior-Senior High School in the amount of \$22,318.00.~~

Prepared By:

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Counsel for Christine Biros

Consented to By:

By: /s/ Charles O. Zebley, Jr.
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Chapter 7 Trustee

BY THE COURT:

Dated: _____

Honorable Carlota Bohm
United States Bankruptcy Judge